

Mr. Richard H. Karney, PE Manager, Energy Star Program Office of Building Technology Assistance Building Technology, State and Community Programs

March 27, 2002

Dear Rich:

Thank you very much for the opportunity to participate in last week's discussion on the new energy star guidelines. The lively discussion was orchestrated in a very fair and professional manner. I look forward to many more opportunities to work together in the future.

At times the meeting seemed to gravitate toward peripheral issues such as environmental pollution and peak energy consumption. There is no doubt that these are important issues, but they should not be the prime focus of a window-labeling program. I see those issues as by-products of putting energy efficient products in the openings. I think that they are a great marketing story to be polished brilliantly by marketing and advertising campaigns, but this meeting was to reach consensus on appropriate values for U-value and SHGC. If we make the right decisions to affect total energy consumption, the other issues will also be impacted positively.

I think that there is really one obvious path forward. I think that any other option will simply result in another round of meetings (discussion can be good?) or even deterioration to talks of restrictive trade practices.

- 1) I see the DOE needing the Energy Star Program to meet or exceed the IECC requirements.
- 2) I see the sputter coat and pyrolitic glass manufacturers both needing an ample opportunity to compete.
- 3) Yes, I do work for the nation's largest manufacturer of vinyl replacement windows, but I do see the need to avoid restricting the aluminum manufacturers from a chance to compete in the southern markets.

I believe that we don't need to use the Energy Star Program to restrict certain products from certain markets. If my product provides superior energy performance and cost savings over a different type, then shouldn't I have some confidence that the market will recognize such value? I think if we don't provide the opportunity for all manufacturers to market their product, this program will not move forward.

I am supplying a copy of this letter to Thomas Zaremba and Garrett Stone. I am in hope that both parties will review the following proposal and contact you with an endorsement. I think that a reasonable implementation time was resolved at the meeting.

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I would offer the following recommendation:

<2000 HDD

U<.6, SHGC<.4 This exceeds IECC and offers opportunity for Aluminum Manufacturers

2000-3500 HDD

U<.5, SHGC <.4 This equals IECC and represents a tightening over the current E*

3500-6000 HDD

U<.4, SHGC =Any

This exceeds IECC yet allows both sputter coat and pyrolitic products.

>6000 HDD The 1st option meets the IECC, the 2nd option exceeds IECC per RESFEN

This allows both the sputter coat and pyrolitic products

U<.35, SHGC=Any

This also affords us the opportunity to tune the windows per exposure with

Or the use of RESFEN

U<.38, SHGC>.5

Please contact me if I may be of further assistance on this issue or any others. Once again, thank you for the opportunity to participate and I hope that these recommendations are well received.

Sincerely,

Chuck Anderson, PE Testing Manager Simonton Windows 800-746-6687, x4807 Chuck_Anderson@simonton.com